

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

LAURA BROWN

Defendant

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Case No. 16-3077-01-CR-S-BCW

**DEFENDANT LAURA BROWN'S
SENTENCING MEMORANDUM**

Defendant Laura Brown is scheduled to be sentenced on August 7, 2018, for Conspiracy to Distribute 100 Grams or More of Heroin, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B) and 846. Ms. Brown is in agreement with the information contained in the Government's Sentencing Memorandum concerning the statutory and guideline calculations, as well as the information in that document concerning the statutory sentencing factors. Ms. Brown desires, through this memorandum, to provide supplemental information about her participation in treatment programs while in custody and her future plans.

Treatment Participation While in Custody

Ms. Brown has been in custody just shy of 19 months, having been taken into custody on January 9, 2017 upon her change of plea. During this time, she has been held at the Greene County Jail in Springfield, Missouri.

Mr. Brown reports that during the past 18 months she has participated in NA, AA and Al-Anon, all programs which she intends to continue if in custody and upon her release. She has completed two eight-week therapy courses to address anxiety. She has regularly attended different church-based classes as they have been available. She feels that she has internalized the tools and methods she has learned through these treatment resources and intends to use them in her everyday life.

Home Plan

Upon her release, whenever that should be, Ms. Brown will reside with her parents in Springfield, Greene County, Missouri. Ms. Brown has close ties to her family, including her parents and siblings, as well as her now six-year-old daughter, who has been residing with Ms. Brown's parents during her period of incarceration.

Ms. Brown intends to focus on her sobriety and her responsibilities as a mother. She has previously been employed as a server and, to the extent that working in the food industry is consistent with her goal of sobriety, she intends to obtain legal income as a server for the short-term so that she can support her daughter and eventually have a place of their own. Her long-term goal is to return to cosmetology school and obtain her cosmetology license, with an eye toward owning and operating her own salon at some point in the future.

Ms. Brown has articulated an ambitious but realistic plan for the future, that includes concrete and measurable steps to achieve her goals.

Ms. Brown will benefit significantly from the support of her family, which will be necessary to her success. Her family is willing and able to provide support for Ms. Brown until she can become self-supporting. As stated above, her family has, most importantly, cared for her daughter while she has been in custody. During this time, her family and her daughter visited her regularly. Ms. Brown's mother, and two of her sisters have provided letters to the court stating their support for Laura and the changes they've seen in her. With their continued support, Ms. Brown has a greatly increased chance at a successful future.

Conclusion

Upon consideration of the facts and circumstances in the case, the sentence requested by the Government in their sentencing memorandum is sufficient, but not more than necessary, to

meet the goals set forth by the statutory sentencing factors, and Ms. Brown would ask the Court to accept the Government's recommendation.

Respectfully submitted,

/s/ James Hayes

James R. Hayes MO Bar #61213
LAW OFFICES OF KRISTOFFER BAREFIELD, LLC
214 W. Phelps, Ste. 102
Springfield, Missouri 65806
Phone: (417) 720-1000
Fax: (417) 616-0076
james@barefieldlaw.com
Attorney for Defendant

Certificate of Service

I hereby certify that on August 3, 2018, a true and correct copy of the foregoing document was filed with the Court using the Court's CM/ECF system and was served upon each attorney of record via ECF notification.

/s/ James Hayes
